

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA

*Plaintiff*

§

§ CRIMINAL DOCKET 4:24-CR-00543

§ HONORABLE KEITH P. ELLISON

VS

§

§

§

MICHAEL DUNPHY

*Defendant*

§

§

§

AGREED MOTION TO AMEND CONDITIONS OF BOND

*TO THE HONORABLE JUDGE KEITH P. ELLISON:*

Michael Dunphy (Dunphy) files this motion to request permission to travel to the Eastern District of Texas for medical obligations and to visit close family members, and would show as follows:

BACKGROUND

Dunphy is charged by indictment with one count of conspiracy to engage in a pattern of racketeering activity and one count of assault in aid of racketeering activity. ECF No. 67. Dunphy was granted bond restricting his travel to the Southern District of Texas. ECF No. 165 (pg. 2). During the bond hearing, counsel was unaware that Dunphy lived close to the border of the Southern and Eastern Districts of Texas and that his doctors and certain close family members lived in the Eastern District of Texas. Dunphy has complied with all bond conditions and is in good standing with Probation.

REQUEST TO AMEND CONDITIONS OF BOND TO ALLOW APPROVED TRAVEL WITH TEXAS

Counsel has communicated with the Assistant United States Attorney and the Probation Department. Neither party opposes this motion. Therefore, Dunphy seeks to amend his bond conditions to allow travel within the Southern and Eastern Districts of Texas.

PRAYER

Dunphy prays this Court will grant his request and allow him to travel within the Southern and Eastern Districts of Texas.

Respectfully submitted,  
FAZEL LAW

/s/ Ali R. Fazel  
Ali R. Fazel  
State Bar of Texas: 24012611  
5373 West Alabama, Suite 600  
Houston, Texas 77056  
Telephone: (713) 526-6020  
Ali@FazelLaw.com  
Attorney for Defendant,  
**MICHAEL DUNPHY**

CERTIFICATE OF CONFERENCE

The parties have discussed this motion and agree with the stated request.

Date: April 14, 2025

/s/ Ali R. Fazel  
Ali R. Fazel

CERTIFICATE OF SERVICE

The following parties received service of this motion via ECF and electronic mail on April 14, 2025.

**Byron H. Black**

Assistant United States Attorney  
Attorney's Office for the Southern District of Texas  
1000 Louisiana Street, Suite 2300  
Houston, Texas 77002  
Phone: (713) 567-9432  
Email: [Byron.Black@usdoj.gov](mailto:Byron.Black@usdoj.gov)

/s/ Ali R. Fazel

Ali R. Fazel